```
Bill Robins III, Esq. (SBN 296101)
   Robert T. Bryson, Esq. (SBN 156953)
Rex Grady, Esq. (SBN 232236)
   ROBINS CLOUD LLP
   808 Wilshire Blvd., Suite 450
   Santa Monica, California 90401
   Telephone: (310) 929-4200
   Facsimile: (310) 566-5900
   Attorneys for Creditor, Sandra Kelp
   Matthew W. Grimshaw, Esq. (SBN 210424)
   GRIMSHAW LAW GROUP, P.C.
   130 Newport Center Drive, Ste. 140
   Newport Beach, California 92660
   Telephone: (949) 734-0187
   Facsimile: (208) 391-7860
 9
   Counsel for Robins Cloud LLP
10
11
                          UNITED STATES BANKRUPTCY COURT
12
                          NORTHERN DISTRICT OF CALIFORNIA
13
                                SAN FRANCISCO DIVISION
14
   In re
                                           ) Case No. 19-30088 (DM)
15
   PG&E CORPORATION,
                                           ) Chapter 11
16
         and
                                           ) (Lead Case–Jointly Administered)
17
   PACIFIC GAS AND ELECTRIC
   COMPANY
18
                      Debtors
19
                                           ) REQUEST FOR RELIEF UPON
                                            DEFAULT IN SUPPORT OF MOTION
20
   Affects:
                                            FOR ORDER AUTHORIZING
                                             WITHDRAWAL OF COUNSEL
21
        PG&E Corporation
22
        Pacific Gas & Electric Company
                                             [RE: Dkt. Nos. 10160, 10161, 10162, and 10163]
23
     \boxtimes Both Debtors
24
   * All papers shall be filed in the Lead
25
   Case, No. 19-30088 (DM).
26
27
   ///
28
Case: 19-30/2000 ESPOFOR WEED IEF UPON TOPA
                                                ARIS DECLARATION UN SUPPORT
```

1	REQUEST FOR ENTRY OF ORDER BY DEFAULT
2	Under B.L.R. 9014-1(b)(4), Robins Cloud LP ("Firm") hereby requests that Court enter an
3	order by default on its Motion for Order Authorizing Withdrawal of Counsel to Sandra Kelp
4	("Creditor") ¹ , Dkt. No. 10160 ("Motion").
5	RELIEF REQUESTED IN THE MOTION
6	The Motion seeks an order authorizing the Firm to withdraw as counsel of record to the
7	Creditor.
8	NOTICE AND SERVICE
9	A Notice and Opportunity for Hearing on Motion for Order Authorizing Withdraw of
10	Counsel to Sandra Kelp was filed concurrently with the Motion on February 5, 2021, Dkt. No. 1016
11	("Notice and Opportunity for Hearing"). The Motion, the supporting declaration of Robert Bryson,
12	Dkt. No. 10162 ("Declaration"), and the Notice and Opportunity for Hearing were served as
13	described in the Certificate of Service filed on February 5, 2021, Dkt. No. 10163.
14	The deadline to file a response or opposition to the Motion has passed, and no opposition ha
15	been filed with the Court or received by the Firm.
16	DECLARATION OF NO OPPOSITION RECEIVED
17	The undersigned hereby declares, pursuant to 28 U.S.C. §1746, under penalty of perjury,
18	that:
19	1. I am an individual over 18 years of age and competent to make this Declaration.
20	2. I am the founder of Grimshaw Law Group, P.C., and an attorney at law duly
21	admitted to practice before all courts of the State of California and the United States District Court
22	for the Northern District of California.
23	3. I am counsel for the law firm of Robins Cloud LP (the "Firm"), attorneys of recor
24	for Sandra Kelp ("Creditor"). ²
25	4. I have reviewed the Court's docket in these Chapter 11 Cases and determined that
26	
27	¹ Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client
28	relationship with Creditor. Declaration, ¶2, fn.1. ² Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.
	$\frac{1}{2}$

Case: 19-3REQUESTOF OR REPER PROPERTY OF 4

1	no response or opposition has been filed with respect to the Motion.
2	5. A proposed order will be lodged concurrently as provided for in B.L.R. 9014-
3	1(b)(3)(A).
4	WHEREFORE, the Firm hereby requests that the Court enter the proposed order filed
5	concurrently herewith granting the Motion for the reasons set forth therein.
6	Executed on March 2, 2021.
7	GRIMSHAW LAW GROUP, P.C.
8	
9	<u>/s/ Matthew W. Grimshaw</u> Matthew W. Grimshaw
10	Attorneys for Robins Cloud LLP
11	Attorneys for Rooms Cloud ELI
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
77	

28

CERTIFICATE OF SERVICE I hereby certify that on March 2, 2021, I caused the forgoing **REQUEST FOR RELIEF UPON DEFAULT IN SUPPORT OF MOTION FOR ORDER AUTHORIZING** WITHDRAWAL OF COUNSEL to be electronically filed with the Clerk of the Court using the CM/ECF system, which, in turn, caused a notification to be sent to the interested parties, with the exception of Sandra Kelp. I further certify that, on the same date, I caused the foregoing document to be sent via first-class mail, postage prepaid, to the following interested party: Sandra Kelp 9000 Steel Canyon Road Nampa, CA 95820 /s/ Matthew W. Grimshaw MATTHEW W. GRIMSHAW